



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
IL 40980898 853

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Schulman Brothers		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER T-A-S R-7-E, W 1/2 of Sect 3			
03 CITY Big Mound Township	04 STATE IL	05 ZIP CODE 62471	06 COUNTY Wayne	07 COUNTY CODE 191	08 CONG DIST 19
09 COORDINATES LATITUDE 38 29 45		LONGITUDE 088 25 30		Geoff 7.5' Quad (240)	

10 DIRECTIONS TO SITE (Starting from nearest public road)

See Attached Map

III. RESPONSIBLE PARTIES

01 OWNER (If known) R. Baerard		02 STREET (Business, mailing, residential) R. R. #2			
03 CITY Geff	04 STATE IL	05 ZIP CODE 62842	06 TELEPHONE NUMBER ( ) UNK		
07 OPERATOR (If known and different from owner) Schulman Brothers		08 STREET (Business, mailing, residential) P.O. Box 191			
09 CITY Vandalia	10 STATE IL	11 ZIP CODE 62471	12 TELEPHONE NUMBER ( ) UNK		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: \_\_\_\_\_ MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 d) DATE RECEIVED: \_\_\_\_\_ MONTH DAY YEAR ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input type="checkbox"/> YES DATE _____ MONTH DAY YEAR <input checked="" type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input checked="" type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR _____ ENDING YEAR _____ UNK <input checked="" type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Oily Waste (Toxic) Heavy Metals (Soluble/Toxic/Persistent)					

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Ground Water (Population/Environment)

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)  
☐ A. HIGH (inspection required promptly) ☒ B. MEDIUM (inspection required) ☐ C. LOW (inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

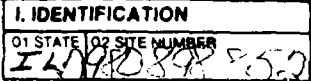
01 CONTACT		02 OF (Agency/Organization)		03 TELEPHONE NUMBER ( )	
04 PERSON RESPONSIBLE FOR ASSESSMENT Richard Fange		05 AGENCY IEPA	06 ORGANIZATION HSCS	07 TELEPHONE NUMBER 217-782-6760	08 DATE 09/03/85 MONTH DAY YEAR

EPA FORM 2070-12 (7-81)

US EPA RECORDS CENTER REGION 5



412399





POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
IL 980898 852

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: 910

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

Highly soluble brine waste placed for disposal in unlined lagoon. This practice has impacted private wells at similar facilities.

01 ☐ B. SURFACE WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ C. CONTAMINATION OF AIR  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☒ F. CONTAMINATION OF SOIL  
03 AREA POTENTIALLY AFFECTED: Unk  
(Acres)

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

Loss of production (Ag land) + damage to soil structure has been noted at similar sites.

(See J following) (See 05 Other following)

01 ☒ G. DRINKING WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: 910

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

See A above

01 ☐ H. WORKER EXPOSURE/INJURY  
03 WORKERS POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

IL 01987 598 554

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED

The near sterilization of soils (>5 acres), Attributed to increased soil salinity, has been noted at other similar sites.  
(See F Above) (See 05 other following)

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION (include names of species)

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
(Soils runoff leaching liquids leaching dioxins)

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

Site was infrequently inspected by regulatory agencies, Facility has now been backfilled making illegal dumping hard to detect.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

Removal of soils by brines is deemed leading cause of soil erosion in several Ill. counties.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 910

IV. COMMENTS

Schulman Brothers  
Address Unreported  
Vandalia, IL 62451

Information as appears  
on ERIS (6-4)

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

S.I.A. study

## EXECUTIVE SUMMARY

This site has been placed in the ERRIS data base as a result of its selection for Phase II evaluation during the federally funded Surface Impoundment Assessment (SIA) study of 1980. During ERRIS placement the operator name and business address were utilized from the SIA which results in deviations from ERRIS for actual site location, Part I section II items 02 through 08 of form 2070-12. This use of operator name and address has also led to one (1) ERRIS listing representing, in actuality, from one (1) to one hundred eight (108) actual brine pits at an equal number of separate locations.

Some considerable effort has been expended to select the site with highest, Phase II SIA, pollution potential where multiple sites are represented by a single ERRIS listing. One must keep in mind that the Phase II SIA represents no more than 7 percent of the brine pits identified in Illinois. Phase I identified more than 3200 pits where Phase II evaluated a random selection of less than 220. One must also maintain a realization that phase II pollution potential was determined by bench top study with little or no actual site visitation or monitoring.

Minimal to no file information exists on this site beyond that contained in Phases I and II of the SIA. There is no direct evidence of hazardous waste disposal at this site beyond the potentially hazardous constituents of Illinois Basin brines, but with only annual inspections by Illinois Mines and Minerals staff relevant to oil production practices and recent backfilling of most brine pits in Illinois, disposal of off site material of unknown nature is possible. A literature review and laboratory analysis of samples from two other sites indicate concern for contamination of groundwater/surface water by Sodium, Sulfate, Chloride etc. (Non-Hazardous Constituents), concern for heavy metals (i.e., Chrome, Vanadium, Barium) and long chain hydrocarbons.

A question arises as to the addressability of the heavy metals by CERCLA when one considers 40 CFR section 300.6 "Definitions - Federally Permitted Release (i)" and Section 101(10) of CERCLA. The statement "and which are reinjected" seems to allow CERCLA action, but interpretation and clarification by USEPA legal staff seems required. The long chain hydrocarbons would appear to be included in the exclusion given to crude oil and fractions thereof under 40 CFR section 300.6 "Definitions-Hazardous Substance" and 101(14) of CERCLA.

A medium priority has been assigned due to the potential impact of this site on groundwater in a rural area where private wells are generally the sole source for potable water. Similar sites have impacted private wells to a point requiring users to seek alternative sources for drinking water. A site inspection should be scheduled to verify/update owner-operator information and gain more thorough site specific information.

RML:bf/22

86° 25'

86° 20'

86° 15'

86° 10'

